

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE**

**JESSICA JONES, MICHELLE VELOTTA,  
and CHRISTINA LORENZEN on Behalf of  
Themselves and All Others Similarly Situated,**

**Plaintiffs,**

v.

**VARSITY BRANDS, LLC; VARSITY  
SPIRIT, LLC; VARSITY SPIRIT FASHION  
& SUPPLIES, LLC; U.S. ALL STAR  
FEDERATION, INC.; JEFF WEBB;  
CHARLESBANK CAPITAL PARTNERS  
LLC; and BAIN CAPITAL PRIVATE  
EQUITY,**

**Defendants.**

Case No. 2:20-cv-02892-SHL-atc

**Jury Trial Demanded**

**NOTICE OF STIPULATION AND [PROPOSED] ORDER ESTABLISHING A  
PLAINTIFFS' DISCOVERY COORDINATION COMMITTEE**

WHEREAS, on August 13, 2020, *Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.* (“*Fusion*”)<sup>1</sup> was filed in this Court, naming Varsity Brands, LLC (“Varsity Brands”); Varsity Spirit, LLC (“Varsity Spirit”); Varsity Spirit Fashion & Supplies, LLC (“Varsity Fashion”) (collectively, “Varsity”), and U.S. All Star Federation, Inc. (“USASF”) as Defendants;

WHEREAS, on August 25, 2020, *Kathryn Anne Radek, et al. v. Varsity Brands, LLC, et al.* (“*Radek*”) was filed in this Court against the same Defendants<sup>2</sup>;

WHEREAS, on September 18, 2020, the Court consolidated the *Fusion* and *Radek* class actions;

WHEREAS, on October 27, 2020, *American Spirit and Cheer Essentials, Inc., et al. v. Varsity Brands, LLC, et al.* (“*American Spirit*”), which named the same core Defendants in

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<sup>1</sup> 2:20-cv-02600-SHL-cgc (W.D. Tenn.).

<sup>2</sup> 2:20-cv-02649-SHL-atc (W.D. Tenn.).

addition to several others, was transferred to this Court from the United States District Court for the Northern District of Georgia<sup>3</sup>;

WHEREAS, on December 10, 2020, *Jessica Jones, et al. v. Bain Capital Private Equity et al.* (“Jones”) (together with *Fusion* and *American Spirit*, the “Related Class Actions”) was filed in this Court, naming the same core Defendants, in addition to several others<sup>4</sup>;

WHEREAS, on December 16, 2020, the Court held a Scheduling Conference attended by counsel for Plaintiffs in all three Related Class Actions, at which the Court encouraged counsel to work together to devise a plan for coordinating discovery, to be submitted to the Court by January 5, 2021;

WHEREAS, counsel for the Plaintiffs in the Related Class Actions met and conferred and agreed upon a Stipulation and [Proposed] Order Establishing a Plaintiffs’ Discovery Coordination Committee, signed by all counsel, under which counsel will work cooperatively to facilitate an efficient course of discovery in the Related Class Actions, which was submitted to the Court in the *Fusion* class action on December 30, 2020.

Accordingly, the *Jones* Plaintiffs hereby file this Notice of Stipulation and [Proposed] Order Establishing a Plaintiffs’ Discovery Coordination Committee, a copy of which is attached hereto as Exhibit A.

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<sup>3</sup> 2:20-cv-02782-SHL-atc (W.D. Tenn.).

<sup>4</sup> 2:20-cv-02892-SHL-cgc (W.D. Tenn.).

Respectfully submitted,

Dated: January 5, 2021

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